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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE JOHN A. HOUSTON)

UNITED STATES OF AMERICA,)	CASE NO. 08CR1454-JA
)	
Plaintiff,)	DATE: June 2, 2008
)	TIME: 8:30 A.M.
v.)	
)	NOTICE OF MOTIONS AND
MOISES VALVERDE-GARCIA,)	MOTIONS TO:
)	
Defendant.)	1) COMPEL DISCOVERY; AND
)	2) <u>LEAVE TO FILE FURTHER MOTIONS.</u>

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
CHRISTOPHER TENORIO, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on June 2, 2008, at 8:30 a.m., or as soon thereafter as counsel may be heard, the defendant, Moises Valverde-Garcia, by and through his counsel, Michelle Betancourt and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the motions listed below.

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MOTIONS

Moises Valverde-Garcia, the defendant in this case, by and through his attorneys, Michelle Betancourt, and Federal Defenders of San Diego, Inc., pursuant to the Fourth, Fifth and Sixth Amendments to the United States Constitution, Fed. R. Crim. P. 12, 16 and 26, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

- 1) Compel discovery; and
- 2) Grant leave to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: May 20, 2008

s/ Michelle Betancourt
MICHELLE BETANCOURT
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Moises Valverde-Garcia